U.S. Department of Energy
Office of River Protection
P.O. Box 450
Richland, Washington 99352

01-OSR-0408

Mr. Ron F. Naventi, Project Manager
Bechtel National, Inc.
3000 George Washington Way
Richland, Washington 99352

Dear Mr. Naventi:

CONTRACT NO. DE-AC27-01RV14136 – OFFICE OF SAFETY REGULATION (OSR) QUESTIONS ON THE REVISED INTEGRATED SAFETY MANAGEMENT PLAN

Reference: BNI letter from A. R. Veirup, BNI, to M. K. Barrett, ORP, "Transmittal for Approval: Contract Deliverable, Revised Standards Approval Package, and Associated Authorization Basis Change Notice ABCN-24590-01-00008, Revision 0, ISMP Standards Approval Package Submittal," CCN 023021, dated September 17, 2001.

The Office of Safety Regulation (OSR) has completed its initial review of the Bechtel National, Inc. (BNI) Integrated Safety Management Plan (ISMP) transmitted by the referenced letter above. The attachment to this letter documents OSR questions and requests for information to support proposed changes.

The OSR intends to promptly review your responses to the attachment, when received. A response by November 16, 2001, will ensure that the review schedule is maintained. The OSR will consider BNI responses in completing its review of the portions of the submittal that can be approved before the PSAR submittal. When this portion of the review is complete, the OSR will communicate to BNI its decision regarding the request for "early approval" contained in the referenced letter above. Please direct any questions to Dr. Narinder (Ninu) Kaushal, (509) 373-9443.

Nothing in this letter should be construed as changing the Contract, DE-AC27-01RV14136. If, in my capacity as the Safety Regulation Official, I provide any direction that your company believes exceeds my authority or constitutes a change to the Contract, you will immediately notify the Contracting Officer and request clarification prior to complying with the direction.

Sincerely,

Robert C. Barr
Safety Regulation Official
Office of Safety Regulation

OSR:NNK

Attachment

Office of Safety Regulation	Review Team Question or Comment Form
Date: 09/26/01	

Question/Comment No.: 01-ISMP-001

Cited Reference:

1. Contract No. DE-AC27-01RV14136, Section C, Standard 7, paragraph (e)(2)(iii).
2. RL/REG-97-13, *Office of Safety Regulation Position on Contractor-Initiated Changes to the Authorization Basis*

Cited Submittal Text:

"3.16.1.1 RPP-WTP Contractor Corporate Safety Oversight

The RPP-WTP Contractor corporate organization provides ongoing oversight and review of Project matters that affect radiological, nuclear, and process safety. This corporate oversight is provided to the RPP-WTP Project Manager by senior level management of the RPP-WTP Project contractor corporate organization. To provide this support, corporate management periodically makes recommendations based on review of items . . .

Corporate management also initiates special independent assessments or audits, as necessary, to obtain additional information concerning the effectiveness of radiological, nuclear, and process safety programs or management controls at the Project."

Question/Comment:

In Section 3.16.1.1, on page 3-35 of the proposed ISMP, references to the "Executive Committee" have been replaced with the words "Corporate Safety Oversight," "corporate organization," and "Corporate management." However, in the section above 3.16.1.1, i.e., Section 3.16.1, references to the "Executive Committee" were retained.

With respect to the "Executive Committee," Attachment 2 to CCN 023021, "Integrated Safety Management Plan (ISMP) Early Approval Request Items," states:
"Committee requirements are not met. A Deficiency Report on this was submitted to QA."

Attachment 2 to the ABCN, "Integrated Safety Management Plan (ISMP) Revised Standards Approval (SAP) ABCN Summary of Proposed ISMP Changes/Safety Evaluation," asserts that the deletion of the commitment for an "Executive Committee" is a "clarification update" and there is "no reduction of prior ISMP commitments."

(a) Provide the details and present status of the above referenced Deficiency Report.
(b) Confirm whether or not the commitment to an RPP-WTP Executive Committee is to be deleted.
(c) If the commitment is to be deleted, provide your safety evaluation of the proposed reduction in commitment.

Explanation/Discussion:

Office of Safety Regulation	Review Team Question or Comment Form
Date: 09/26/01	

Question/Comment No.: 01-ISMP-002

Cited Reference:

1. Contract No. DE-AC27-01RV14136, Section C, Standard 7, paragraph (e)(2)(iii).
2. RL/REG-97-13, *Office of Safety Regulation Position on Contractor-Initiated Changes to the Authorization Basis*

Cited Submittal Text:

From Section 11.1, "Design, Construction, and Commissioning Contractor Organization Roles, Responsibilities, and Authorities,"

"Project Manager

The Project Manager roles, responsibilities, and authorities related to safety include:

1) Assigning roles and responsibilities for safety-related activities
2) Setting performance expectations
3) Developing management assessment policies
4) Signatory on permit applications for construction of the Facility
5) Implementing the Employee Concerns Program"

Question/Comment:

In Section 11.1, on page 11-2 of the proposed ISMP, the responsibility of the Project Manager to serve as a member of the Executive Committee has been deleted.

With respect to "Project Manager Roles, Responsibilities, and Authorities, Item 7)," Attachment 2 to CCN 023021, "Integrated Safety Management Plan (ISMP) Early Approval Request Items," states:

"The PM does not serve as a member of the Executive Committee, as this committee does not currently exist. A Deficiency Report on this was submitted to QA."

Attachment 2 to the ABCN, "Integrated Safety Management Plan (ISMP) Revised Standards Approval (SAP) ABCN Summary of Proposed ISMP Changes/Safety Evaluation," does not address this proposed deletion.

(a) Provide the details and present status of the above referenced Deficiency Report.
(b) Provide your safety evaluation of the proposed deletion of this Project Manager responsibility.

Explanation/Discussion:

Office of Safety Regulation	Review Team Question or Comment Form
Date: 09/26/01	

Question/Comment No.: 01-ISMP-003

Cited Reference:

1. Contract No. DE-AC27-01RV14136, Section C, Standard 7, paragraph (e)(2)(iii).
2. RL/REG-97-13, *Office of Safety Regulation Position on Contractor-Initiated Changes to the Authorization Basis*

Cited Submittal Text:

3.16.2 Safety Improvement Program
A safety improvement program for radiological, nuclear, and process safety during operations will be developed and implemented by the PSC.

Question/Comment:

In Section 3.16.2, on page 3-37 of the proposed ISMP, the words "for radiological, nuclear, and process safety during operations will be" replace the word "is."

With respect to "PSC developed and implemented safety improvement program," Attachment 2 to CCN 023021, "Integrated Safety Management Plan (ISMP) Early Approval Request Items," states:
"Interpretation needed to clarify intent was for this section to be met during operations for radiological, nuclear, and process safety.
Rewording proposed in ISMP SAP to clarify program applies during operations project phase."

Attachment 2 to the ABCN, "Integrated Safety Management Plan (ISMP) Revised Standards Approval (SAP) ABCN Summary of Proposed ISMP Changes/Safety Evaluation," asserts that the deletion of the commitment for a "Safety Improvement Program" prior to the operations project phase is a "clarification update" and there is "no reduction of prior ISMP commitments."

(a) Explain the basis for the assertion the "intent was for this section to be met during operations."
(b) Provide your safety evaluation of the proposed reduction in the commitment to have a Safety Improvement Program prior to the operations project phase.
(c) As noted in BNI Letter CCN: 021904, August 6, 2001, "Contract Clause B.8 directs the WTP contractor to develop, obtain U.S. Department of Energy (DOE), Office of River Protection (ORP) approval, and implement an ISMS . . ." BNI is currently implementing an ISMS against a schedule that supports Phase I verification in April 2002. A core expectation of the Phase I ISMS is, "The ISMS should be continuously improved through an assessment and feedback process, which should be established at each level of work and at every stage in the work process." Given current BNI actions and commitments, and the requirements of the BNI contract, why does the ISMP limit this safety improvement program to operations?

Explanation/Discussion:

Office of Safety Regulation	Review Team Question or Comment Form
Date: 09/26/01	

Question/Comment No.: 01-ISMP-004

Cited Reference:

1. Contract No. DE-AC27-01RV14136, Section C, Standard 7, paragraph (e)(2)(iii).
2. RL/REG-97-13, *Office of Safety Regulation Position on Contractor-Initiated Changes to the Authorization Basis*

Cited Submittal Text:

3.16.7 Lessons Learned
Lessons-learned includes the identification, documentation, validation, and dissemination of lessons-learned information from the Project. Industry experience that draws on lessons learned, events, deficiencies, and other similar information from other operating sites for the purpose of enhancing the safety of the facility will be considered during the design phase of the project.

1.3.16 Configuration Management (paragraph 4, page 1-22)
The need for changes to engineered features or administrative controls can arise from commissioning, human factors reviews, corrective actions identified by the incident investigation process internal oversight process and the performance of assessments, lessons learned program, employee feedback program, performance of emergency drills and exercises, need to improve the waste process operation, and continuous review of public and worker safety.

Question/Comment:

In Section 3.16.7, on page 3-40 of the proposed ISMP, references to a lessons-learned "program" "established and maintained by the ES&H Organization" have been deleted. Also, the word "established" was replaced with the word "considered." Finally, the phrase "early in Part B" was replaced by the phrase "during the design phase of the project."

With respect to "Project Lessons Learned," Attachment 2 to CCN 023021, "Integrated Safety Management Plan (ISMP) Early Approval Request Items," states:
"Requirements, as written to have a "program", are not clear.
Rewording proposed in ISMP SAP to clarify general application of lessons learned, rather than a specific program."

Attachment 2 to the ABCN, "Integrated Safety Management Plan (ISMP) Revised Standards Approval (SAP) ABCN Summary of Proposed ISMP Changes/Safety Evaluation," asserts that the deletion of the commitment for specific program for lessons learned is a "clarification update" and there is "no reduction of prior ISMP commitments."

Provide your rationale that

(a) the deletion of the "program" for lessons learned,
(b) the change from "established" to "considered," and
(c) the change from "early in Part B" to "during the design phase of the project,"

are not a reductions in commitments or your safety evaluations of the proposed reductions in commitments.

Explanation/Discussion:

Office of Safety Regulation	Review Team Question or Comment Form
Date: 09/26/01	

Question/Comment No.: 01-ISMP-005

Cited Reference:

1. Contract No. DE-AC27-01RV14136, Section C, Standard 7, paragraph (e)(2)(iii).
2. RL/REG-97-13, *Office of Safety Regulation Position on Contractor-Initiated Changes to the Authorization Basis*

Cited Submittal Text:

Proposed ISMP Section 3.12, "Human Factors," in its entirety.

Question/Comment:

In the proposed ISMP, Section 3.12, "Human Factors," is replaced in its entirety.

With respect to "Human Factors," Attachment 2 to CCN 023021, "Integrated Safety Management Plan (ISMP) Early Approval Request Items," states:
"Justification for revision of this entire section includes:

1. Section was not entirely technically correct or proper
2. Section contained some cultural (UK vs. USA) and corporate (BNFL vs. Bechtel) differences that no longer apply.
3. Section was too narrowly focused
4. Human factors responsibilities and commitments were not adequately explained nor delineated
5. Section does not fully incorporate regulatory expectations

Rewording proposed in ISMP SAP."

Attachment 2 to the ABCN, "Integrated Safety Management Plan (ISMP) Revised Standards Approval (SAP) ABCN Summary of Proposed ISMP Changes/Safety Evaluation," repeats the above five conclusions as the basis/rationale for the proposed revision. The proposed revision "Basis for AB impact assessment/Safety Evaluation of Revision" states that replacing the text of this section in its entirety is a "clarification update" and there is "no impact on prior ISMP commitments or safety basis for the WTP relative to safety criteria." Without further explanation it is not clear that this basis holds merit.

Provide the facts supporting the above five conclusions by answering the following questions:

(a) What was not technically correct? What was not proper?
(b) What cultural differences no longer apply? What corporate differences no longer apply?
(c) In what way was the section too narrowly focused?
(d) What human factors responsibilities and commitments were not adequately explained or delineated?
(e) What regulatory expectations were not fully incorporated?
(f) How does the proposed revision resolve the above problems?

As an alternative to answering the above six questions, the Contractor may address the issue as if this were an initial submittal rather than a proposed change by providing a description of how the new Section 3.12 documents the processes by which human-factors-related requirements are incorporated into RPP-WTP programs.
Explanation/Discussion:

Office of Safety Regulation	Review Team Question or Comment Form
Date: 10/2/01	
Question/Comment No.: 01-ISMP-006	
Cited Reference: *ISMP Reference*: Section 3.6.1 Normal Operations, last paragraph	
Cited Submittal Text: Section 3.6.1 Normal Operations, last paragraph: "The close relationship between Hanford tank farms operations and the RPP-WTP may require additional administrative controls and documentation in support of AP-106 operations."	
Question/Comment: This section appears to reflect the original privatization baseline with the Contractor operating AP-106 as a feed tank. What is the significance of AP-106 versus interface with the balance of the tank farm system?	
Explanation/Discussion:	

Office of Safety Regulation	Review Team Question or Comment Form
Date: 10/2/01	
Question/Comment No.: 01-ISMP-007	
Cited Reference:	
Cited Submittal Text: Section 3.7 Proven Engineering Practices, first paragraph: "For the novel uses of existing technologies (such as the use of specific ion exchange resins), the PHA ensures that the safety aspects are examined in a structured research and development program to be assured that hazard potential are reduced as far as practicable or that protection put in place is commensurate with the assessed magnitude of the Hazard."	
Question/Comment: "PHA" has been changed to "ISM process" in other places in the ISMP. Is "PHA" the intended term for this section?	
Explanation/Discussion:	

Office of Safety Regulation	Review Team Question or Comment Form
Date: 10/2/01	
Question/Comment No.: 01-ISMP-008	
Cited Reference:	
Cited Submittal Text: Section 3.9.1.1 Radioactive Material Confinement, first paragraph: "Unfiltered ventilation flow is normally from areas of lower potential contamination to areas of higher potential contamination."	
Question/Comment: The revised wording implies that ventilation flow is sometimes from areas of higher contamination to lower contamination or filtered flow can be from areas of higher potential contamination to lower potential contamination areas. What are the scenarios in the facility where filtered or unfiltered ventilation flow is from higher to lower contamination areas?	
Explanation/Discussion:	

Office of Safety Regulation	Review Team Question or Comment Form
Date: 10/2/01	
Question/Comment No.: 01-ISMP-009	
Cited Reference:	
Cited Submittal Text: Section 3.11 Safety Systems Design, second paragraph: BNI proposes deleting the hierarchy of safety measures in this section. BNI states this paragraph is redundant and unnecessary for this section.	
Question/Comment: Where is the Section 3.11, second paragraph information covered? Alternatively, if not discussed elsewhere, explain why this reduction in commitment is appropriate, or alternatively, why the ISMP is acceptable without this description.	
Explanation/Discussion:	

Office of Safety Regulation	Review Team Question or Comment Form
Date: 10/2/01	
Question/Comment No.: 01-ISMP-010	
Cited Reference:	
Cited Submittal Text: Section 5.3 Configuration Management, first bullet: "The procedures ensure that, prior to a given change, the following considerations are addressed: The need to perform an unreviewed safety question (USQ) evaluation, after production operation authorization"	
Question/Comment: The Contractor proposed to revise the section by adding the words "after production operation authorization." Explain why the need to perform an unreviewed safety question (USQ) evaluation is limited to "after production operation authorization," and why a USQ evaluation need not be performed during commissioning.	
Explanation/Discussion:	

Office of Safety Regulation	Review Team Question or Comment Form
Date: 09/27/01	
Question/Comment No.: 01-ISMP-11	
Cited Reference: DOE/RL-96-0003, Revision 1, Section 4.3.2, item D "The current SRD and ISMP and an assessment of compliance …"	
Cited Submittal Text: ISMP, Section 9.0 Scheduling of Activities Related to Safety " This chapter provides the sequence of events for activities related to safety and deliverables for design, fabrication and construction, commissioning, operation, and deactivation phases of the Project. The activities related to safety to be conducted during these phases are also presented."	
Question/Comment: Contrary to the statement in the cited text, Table 9.1 does not list radiation protection program (RPP) among key activities related to safety during design, fabrication and construction, and commissioning phases. The first phase for which the RPP is listed among key activities related to safety is operations. Explain the following: (a) Why does the ISMP Table 9.1 not reflect current practices and commitments with respect to preparation and implementation of the RPP during design, construction and fabrication, and commissioning? (b) What evaluation did BNI perform to assure that the revised ISMP submittal in support of construction authorization has been updated to reflect current practices related to radiological, nuclear, and process safety during construction?	
Explanation/Discussion:	

Office of Safety Regulation	Review Team Question or Comment Form
Date: 10/01/01	

Question/Comment No.: 01-ISMP-12

Cited Reference:
SRD SC 4.3-7, Rev. 4, Page 4-16, Sentence 2, "If credit is taken for operator action to satisfy the accident exposure standards of Safety Criteria 2.0-1 and/or 2.0-2, adequate radiation protection shall be provided to permit access and occupancy of the control room under accident conditions without personnel receiving radiation exposures in excess of **5 rem whole body gamma [emphasis added]** and 30 rem beta skin for the duration of the accident."

10 CFR 835.202(a) Occupational dose limits for general employees, "…the occupational dose received by general employees shall be controlled such that the following limits are not exceeded in a year: (a) A total effective dose equivalent of 5 rems…"

10 CFR 835 Subpart K - Design and Control.

Cited Submittal Text:
ISMP Section 1.3.7, Page 1-10, Second sentence from the bottom, "If credit is taken for operator action to satisfy the public radiological exposure standards in the SRD Volume II, adequate radiation protection is provided to permit access and occupancy of the control room or other control location under accident conditions without personnel receiving radiation doses in excess of **25 rem TEDE whole body gamma [emphasis added]** and 30 rem beta skin for the duration of the accident."

ISMP Section 1.3.8, Page 1-15A, Paragraph 2, Sentence 1, "If credit is taken for operator action to satisfy the worker radiological exposure standards of the SRD Volume II, adequate radiation protection is provided to permit access and occupancy of the control room or other control location under accident conditions without personnel receiving radiation doses in excess of **5 rem whole body gamma [emphasis added]** and 30 rem beta skin for the duration of the accident."

Question/Comment:
a) What is the reason for the differences in whole body gamma doses to the operator in ISMP Sections 1.3.7 and 1.3.8 and SRD SC 4.3-7?

b) Section 1.3.7 communicates that the control room worker would be expected to perform his occupational duties under a scenario that exceeds the 10 CFR 835.202 dose limits. How does relaxation of the exposure limit to the control room worker from 5 rem whole body gamma to 25 rem TEDE meet the 10 CFR 835.202 dose limits and the 10 CFR 835 Subpart K dose and ALARA requirements?

Explanation/Discussion:

Office of Safety Regulation	Review Team Question or Comment Form
Date: 10/01/01	
Question/Comment No.: 01-ISMP-013	
Cited Reference: 1. Contract No. DE-AC27-01RV14136, Section C, Standard 7, paragraph (e)(2)(iii). 2. RL/REG-97-13, *Office of Safety Regulation Position on Contractor-Initiated Changes to the Authorization Basis*	
Cited Submittal Text: ISMP, Rev 6, Section 5.6.8, page 5-13: In the first line of the paragraph, the proposed change deletes the phrase "and workers".	
Question/Comment: The rationale given by the Contractor for proposing to delete "workers" was that section 7.8 of the SRD applied to the public only. However, Section 7.8-2, item (7), refers to a "description of protective actions for responders, ***workers*** (emphasis added), and the public…". Furthermore, each of the subsections of 7.8 refers to Section 3.10 of the ISMP as one of the Implementing Codes and Standards, and Section 3.10 includes a table 3-1. The ninth item in the table is called "Emergency Termination and Recovery" and its content is to include, among other things, "…recovery criteria for protection of ***workers*** (emphasis added), and the general public …". Also, the last line of the first paragraph of Section 3.3.1.7 states, "the elements of the Emergency Plan will be designed to ensure that the Project . . . is prepared to respond promptly, efficiently, and effectively to any emergencies during operations to protect the public and ***workers*** (emphasis added)." Finally, the first sentence of Section 1.3.18 states "An important aspect of the safety approach is to ensure the health and safety of the public and the ***workers*** (emphasis added) …". Based on this, explain why "workers" should be deleted.	
Explanation/Discussion:	

Office of Safety Regulation	Review Team Question or Comment Form
Date: 9/22/01	
Question/Comment No.: 01-ISMP-14	
Cited Reference: 1. Contract No. DE-AC27-01RV14136, Section C, Standard 7, paragraph (e)(2)(iii). 2. RL/REG-97-13, *Office of Safety Regulation Position on Contractor-Initiated Changes to the Authorization Basis*	
Cited Submittal Text: ISMP Section 1.3.6, first paragraph, last sentence: "Well-established methods that include factors such as the material at risk and the rate and duration of the release of hazardous material are used in the determinations of the source terms (DOE 1994)." (rev 6c struck out ref to NRC 1988)	
Question/Comment: Both references exist in the previous version of the ISMP, but the text in Section 1.3.6 deletes the reference to the NRC document and only retains the DOE reference. The basis for the change is provided in Attachment 2 of the ISMP, which states, "This reference to NRC is no longer applicable to the RPP-WTP." This is without explanation or basis. What is the technical basis for the removal of the reference "NRC 1988" and why is this not a reduction in commitment?	
Explanation/Discussion: The references NRC 1988 and DOE 1994 are as follows: NRC 1988: *Nuclear Fuel Cycle Accident Analysis Handbook*, NUREG-1320, in revision, US Nuclear Regulatory Commission, Washington, DC. DOE 1994: *Airborne Release Fractions/Rates and Respirable Fractions for Nonreactor Nuclear Facilities*, DOE-HDBK-3010-94, US Department of Energy, Washington, DC.	

Office of Safety Regulation	Review Team Question or Comment Form
Date: September 24, 2001	
Question/Comment No.: 01-ISMP-015	
Cited Reference:	
Cited Submittal Text: Section 3.16.5, Performance Monitoring [Page 3-39]. "Hazardous material and waste tracking systems" (Word "inventory" was deleted).	
Question/Comment: How does a "hazardous material and waste tracking system" differ from a "hazardous material inventory and waste tracking system?"	
Explanation/Discussion: The reviewers note that BNI procedure 24590-WTP-GPP-SIND-014_0, discusses a system for keeping the hazardous material inventory updated and notes the inventory will be updated each time a potentially hazardous chemical is brought on the site.	

Office of Safety Regulation	Review Team Question or Comment Form
Date: September 24, 2001	
Question/Comment No.: 01-ISMP-16	
Cited Reference:	
Cited Submittal Text: Table 8.1, Safety Management Records [Page 8-2]. Deletion of "Initial Safety Analysis Report" (and "Hazard Analysis Report")	
Question/Comment: In other cases where BNI intends to delete references to the ISAR, BNI notes, "…as this information will be provided in the PSAR, DOE confirmation on removal of ISAR reference is required." Why are these deletions (in Table 8.1) not subject to the same limitation on OSR evaluation (i.e., DOE confirmation requirement)?	
Explanation/Discussion:	

Office of Safety Regulation	Review Team Question or Comment Form
Date: September 26, 2001	
Question/Comment No.: 01-ISMP-17	
Cited Reference: 24590-WTP-QAM-QA-01-001, "Quality Assurance Manual," Revision 0.	
Cited Submittal Text: ISMP Section 3.3.1.5, Quality Assurance Program (QAP) [Pages 3-7, 3-8] and ISMP Chapter 11.0, "Organization Roles, Responsibilities, and Authorities [Pages 11-2, 4, 5, 6, and 7]. These pages contain deletions associated with removing items nominally covered in the QAM. As noted below, the reviewer could not identify equivalent text in the QAM. The following are typical of deletions from the ISMP that could not be found in the QAM: Text deleted from ISMP: "The provisions of the Quality Assurance Requirements and Description document DOE/RW/0333P will be applied to QL-1 and QL-2 items and activities associated with HLW services from design through production and acceptance." Text in the QAM: The QA Manual does not describe classification but rather notes that it is "…developed and controlled through engineering procedures…" Text deleted from ISMP: "The Project Manager roles, responsibilities, and authorities related to safety include…Responsibility for RPP-WTP Safety." Text in QAM: "The Project Manager is responsible for the following major functions: Establishing the overall vision for the project and instilling a culture of excellence for safety and quality." (The reviewer does not consider these statements equivalent.) Text deleted from ISMP: "The roles, responsibilities, and authorities related to safety of the Area Project Managers, in their respective areas of responsibility, include…Implementing management assessment policies, in their respective area of responsibility." Text in QAM: No equivalent text found. Text deleted from ISMP: "The safety-related roles, responsibilities, and authorities of the Engineering Manager include…Designing fire prevention, detection, and suppression features in compliance with state and federal requirements." Text in QAM: No equivalent text found. Text deleted from ISMP: "The roles, responsibilities, and authorities related to safety of the ES&H Manager include…Implementing internal safety and oversight functions." Text in QAM: No equivalent text found.	

Question/Comment: Where is the equivalent text to the deletion in Section 3.3.1.5 and all deletions in Chapter 11 found in the QAM? Alternatively, what is the BNI safety evaluation for deletions that are not found in the QAM?
Explanation/Discussion:

Office of Safety Regulation	Review Team Question or Comment Form
Date: September 28, 2001	
Question/Comment No.: 01-ISMP-18	
Cited Reference: 24590-WTP-QAM-QA-01-001, "Quality Assurance Manual," Revision 0.	
Cited Submittal Text: ISMP Figure 11-1 [Page 11-3]. Figure 11-1, "Management Structure and Organization for the BNI Design, Construction, and Commissioning Contract"	
Question/Comment: The QAM shows a "solid line" relationship between the Corporate Manager of Quality Assurance and the QA Manager. This relationship ensures the independence of the QA Manager and was a consideration in the OSR approval of the QAM. Why does Figure 11-1 not show the "solid line" relationship between the Corporate Manager of Quality Assurance and the QA Manager?	
Explanation/Discussion:	

Office of Safety Regulation	Review Team Question or Comment Form
Date: 09/26/01	

Question/Comment No.: 01-ISMP-19

Cited Reference:

1. Contract No. DE-AC27-01RV14136, Section C, Standard 7, paragraph (e)(2)(iii).
2. RL/REG-97-13, *Office of Safety Regulation Position on Contractor-Initiated Changes to the Authorization Basis*

Cited Submittal Text:

ISMP Section 3.6.3, last paragraph

Was:

A specific list of SSCs credited for worker and public protection is provided in ISAR Section 4.8, "Controls for the Prevention and Mitigation of Accidents". These SSCs are identified in the master equipment list, which is maintained by the Configuration Management Program as discussed in ISMP Section 5.3, "Configuration Management".

Changed to:

These Important-to-Safety SSCs are identified in the Configuration Management databases, which are maintained by the Configuration Management Program as discussed in ISMP Section 1.3.16, "Configuration Management".

Question/Comment:

In the original ISMP text, there was statement indicating that a specific list of ITS SSCs was included in the ISAR. This sentence was deleted, rather than updated to reference such a list in the PSAR. The reason for deleting, rather than updating the text in ISMP, was not provided. Does BNI intend to provide a specific list of ITS SSCs in the PSAR? If not, what is the basis for this reduction in commitment, or alternatively, why is the ISMP acceptable without such a commitment?

Explanation/Discussion:

Office of Safety Regulation	Review Team Question or Comment Form
Date: 09/26/01	

Question/Comment No.: 01-ISMP-020

Cited Reference:

1. Contract No. DE-AC27-01RV14136, Section C, Standard 7, paragraph (e)(2)(iii).
2. RL/REG-97-13, *Office of Safety Regulation Position on Contractor-Initiated Changes to the Authorization Basis.*
3. RL/REG-96-0003, *Section 4.3.2, Item D*

Cited Submittal Text:

Section 5.1, Process Safety Information

The interaction matrix for the RPP-WTP is provided in Section 4.2, "Chemical Interactions", of the Part A Hazard Analysis Report (HAR). A list of the process chemicals used in the RPP-WTP and their hazardous characteristics is also provided in the Part A HAR Section 4.1.2, "Process Chemicals".

Question/Comment:

The text "Part A" was added to the existing HAR citations in Section 5.1 ISMP. These HAR citations identify the process chemical hazards that are addressed under the Process Safety Management program described in Section 5.0 of the ISMP. The justification for the change states that this was done because it "clarifies historic Part A information." The purpose of this ISMP revision is to describe safety management processes for the construction phase of the facility, not document "historic Part A information." Why weren't these citations updated to reflect process hazards information in the PSAR?

Explanation/Discussion:

Office of Safety Regulation	**Review Team Question or Comment Form**
Date: 09/26/01	

Question/Comment No.: 01-ISMP-021

Cited Reference:

1. Contract No. DE-AC27-01RV14136, Section C, Standard 7, paragraph (e)(2)(ii).
2. 10 CFR 830, *Nuclear Safety Management*

Cited Submittal Text:

Section 2.0, Compliance with Laws and Regulations

General compliance with statutes that relate to radiological, nuclear, and process safety is described in this chapter. Compliance with 10 CFR 830, Subpart A and 10 CFR 835 is discussed respectively in Section 2.2, "Compliance with 10 CFR 830, Subpart A, 'Quality Assurance' " and Section 2.3, "Compliance with 10 CFR 835, 'Occupational Radiation Protection'".

Question/Comment:

10 CFR 830 has been extensively revised since the last general revision of the ISMP. This revision of the ISMP updates references to the quality assurance aspects of the rule, however, new requirements of 10 CFR 830 have not been addressed. 10 CFR 830 and 10 CFR 830 Subpart B establishes requirements that "relate to radiological, nuclear, and process safety." Why isn't compliance with 10 CFR 830 Subpart B addressed in Section 2.0 (or elsewhere) in the ISMP? Why isn't compliance with applicable elements of 10 CFR 830 (e.g., 10 CFR 830.6 and 830.7) addressed?

Explanation/Discussion:

Office of Safety Regulation	**Review Team Question or Comment Form**
Date: 09/26/01	

Question/Comment No.: 01-ISMP-022

Cited Reference:

1. Contract No. DE-AC27-01RV14136, Section C, Standard 7, paragraph (e)(2)(iii)
2. RL/REG-98-06, *Corrective Action/Enforcement Action Program Description*
3. 10 CFR 820, *Procedural Rules for DOE Nuclear Activities*

Cited Submittal Text:

Section 2.5, Compliance with 10 CFR 820

Section 10.4.2, DOE Corrective Action/Enforcement Program

Question/Comment:

These sections of the ISMP do not clearly describe BNI's process for identifying, reporting, and correcting noncompliances with DOE nuclear safety requirements as described in RL/REG 98-06. Accordingly, provide the following information:

(a) Will BNI assign a PAAA Coordinator? If so, what is the reporting relationship of the PAAA Coordinator?

(b) How will noncompliance reporting be accomplished? Will noncompliances be reported through the ORP PAAA Coordinator and the DOE noncompliance tracking system (NTS)? If not, what means will be used?

(c) What screening criteria will be used to determine which noncompliances are reported to DOE?

(d) How will noncompliance reports be reviewed and approved by BNI?

(e) How will corrective actions be formulated, tracked, and closed, including coordination with DOE?

Explanation/Discussion:

Office of Safety Regulation	**Review Team Question or Comment Form**
Date: 09/26/01	
Question/Comment No.: 01-ISMP-023 (Assigned by RTL)	
Cited Reference: 1. DOE/RL-96-0006, Section 4.1.3, *Authorization Basis* 2. RL/REG-97-13, *Office of Safety Regulation Position on Contractor-Initiated Changes to the Authorization Basis*	
Cited Submittal Text: Section 3.3, Authorization Basis Section 9.2, Scheduling of Events for Regulatory Submittals	
Question/Comment: ISMP Section 9.2 was revised and now outlines various construction phase authorization requests that BNI intends to submit and certain documentation that will be submitted in connection with these requests. The description of the authorization basis in Section 3.3 of the ISMP does not describe the authorization basis in terms of this documentation throughout the WTP construction phase. Explain how the authorization basis description and change process described in Section 3.3 of the ISMP is consistent with Section 9.2 of the ISMP.	
Explanation/Discussion:	

Office of Safety Regulation	**Review Team Question or Comment Form**
Date: 09/26/01	

Question/Comment No.: 01-ISMP-24

Cited Reference:

1. Contract No. DE-AC27-01RV14136, Section C, Standard 7, Table S7-1, *Construction Occurrence Reporting Plan*
2. Limited Construction Authorization Request, *Construction Occurrence Reporting Plan for Limited Construction*

Cited Submittal Text:

Section 3.16.3, Incident Investigations

Question/Comment:

A Construction Occurrence Reporting Plan is required for construction authorization regulatory actions by Table S7-1 of the BNI contract. Such a plan was submitted by BNI in connection with the Limited Construction Authorization Request. The plan was approved by the OSR and is incorporated in the authorization basis for limited construction. The reporting discussion in Section 3.16.3 of the ISMP does not describe implementation of the Construction Occurrence Reporting Plan.

a. How and when will the Construction Occurrence Reporting Plan be submitted in connection with the construction authorization request?

b. Will the Construction Occurrence Reporting Plan be revised for the Construction Authorization Request?

c. Also, there are a number of references to "incident reporting" processes in the ISMP. Are the "incident reporting" processes referred to in the ISMP equivalent to the occurrence reporting process described in the Construction Occurrence Reporting Plan? If not, explain "incident reporting."

Explanation/Discussion:

Office of Safety Regulation	Review Team Question or Comment Form
Date: 09/26/01	
Question/Comment No.: 01-ISMP-25	
Cited Reference: 1. Contract No. DE-AC27-01RV14136, Section C, Standard 7, paragraph (e)(2)(iii). 2. RL/REG-97-13, *Office of Safety Regulation Position on Contractor-Initiated Changes to the Authorization Basis*	
Cited Submittal Text: ISMP Section 4.1.1, Item 4 Was: Documents that the facility design meets the required Safety Criteria and documents how and why the engineered and administrative controls credited for public and worker safety were identified. In Part B, when policies and procedures are written to implement the administrative controls, these policies and procedures will be identified in the SRD. Changed to: Documents that the facility design meets the required Safety Criteria and documents how and why the engineered and administrative controls credited for public and worker safety were identified. During commissioning, when policies and procedures are written to implement the administrative controls, these policies and procedures will be identified in the SRD.	
Question/Comment: The proposed change alters a commitment regarding when specific information will be added to the SRD. Under the existing commitment, any "policies and procedures" that implement "administrative controls credited for public and worker safety" would be incorporated in the SRD during the detailed WTP design process preceding the submittal of the Construction Authorization Request. Under the revised commitment, this information will be incorporated in the SRD sometime during the commissioning phase of the project. The rationale and basis provided for the change does not address this impact on the original commitment. What is the basis for determining that this proposed change is not a reduction in commitment, or alternatively, why is ISMP acceptable with such a change? Also, the rationale provided for this proposed change states that the change "Clarifies when types of polices and procedures will be identified, rather than an explicit list of this documentation." This statement is unclear. What "explicit list" of documentation is being referred to? How does the proposed change relate to the list?	
Explanation/Discussion:	

Office of Safety Regulation	Review Team Question or Comment Form
Date: 09/26/01	

Question/Comment No.: 01-ISMP-26

Cited Reference:

1. Contract No. DE-AC27-01RV14136, Section C, Standard 7, paragraph (e)(2)(iii).
2. RL/REG-97-13, *Office of Safety Regulation Position on Contractor-Initiated Changes to the Authorization Basis*

Cited Submittal Text:

ISMP Section 3.4, Safety/Quality Culture

…the WTP contractor establishes measurable goals in the areas of radiological and chemical exposure limits for the public and workers, and environmental radiological release limits. The WTP contractor then establishes policies that require the communication of the goals to employees and contractors.

Question/Comment:

The second paragraph of Section 3.4 of the ISMP commits to establishing goals related to radiological and chemical exposures and releases. The proposed change alters the "environmental release" to read "environmental radiological release" in Section 3.4. This proposed change appears to eliminate a commitment to establishing environmental release goals related to process chemicals. The rationale and basis provided for the change does not address this impact of the proposed change. What is the basis for determining that this proposed change is not a reduction in commitment, or alternatively, why is ISMP acceptable with such a change?

Also, the second paragraph of Section 3.4 uses the term "limits" in discussing the establishment of exposure and release goals. This makes the text confusing. Why does the term "limits" appear in the discussion of establishing exposure and release goals?

Explanation/Discussion:

Office of Safety Regulation	Review Team Question or Comment Form
Date: 10/10/01	

Question/Comment No.: 01-ISMP-027

Cited Reference:

1. Contract No. DE-AC27-01RV14136, Section C, Standard 7, paragraph (e)(2)(iii)
2. RL/REG-97-13, *Office of Safety Regulation Position on Contractor-Initiated Changes to the Authorization Basis*

Cited Submittal Text:

Section 1.3.16, pg. 1-23, next to last paragraph

Personnel responsible for performing each of the above-listed aspects of configuration management meet minimum qualification requirements for the particular position being filled. For example, ES&H personnel meet the minimum requirements for environmental or safety duties. In addition, personnel involved in the change management process receive training specific to that program. The specific qualification requirements are established during commissioning. The SRD provided the training and qualification standards for RPP-WTP personnel.

Question/Comment: What is the justification for not requiring the specification of qualification requirements for personnel performing configuration management tasks before commissioning of the facility?

Explanation/Discussion: The prior revision stated that these qualification requirements would be established during Part B. The Attachment 2 justification is that this change reflects a global change from "Part B" references to replace that privatization term. This does not provide a technical justification for the adequacy of the requirement.

Office of Safety Regulation	Review Team Question or Comment Form
Date: 10/10/01	

Question/Comment No.: 01-ISMP-28

Cited Reference:

1. Contract No. DE-AC27-01RV14136, Section C, Standard 7, paragraph (e)(2)(iii)
2. RL/REG-97-13, *Office of Safety Regulation Position on Contractor-Initiated Changes to the Authorization Basis*
3. 24590-WTP-SRD-ESH-01-001-02, *Safety Requirements Document,* Safety Criterion 9.2-3

Cited Submittal Text:

Section 3.3.1.4, pg. 3-6

The TSRs, approved prior to start of operations, will be maintained current so that they reflect the RPP-WTP as it is analyzed in the FSAR. They include items in the following categories, as necessary:

1) Safety limits
2) Limiting conditions for operation
3) Surveillance requirements.

Question/Comment: Why is the proposed inclusion of "as necessary" in the above proposed ISMP text acceptable, given that the SRD (Safety Criterion 9.2-3) contains no such qualifying language?

Explanation/Discussion: SRD Safety Criterion 9.2-3, which references Section 3.3.1.4 of the ISMP as an Implementing Code or Standard, states that TSRs shall consist of the following (among others):

1) Safety Limits (SLs)
2) Limiting Conditions for Operation (LCOs)
3) Surveillance Requirements

SRD Safety Criterion 9.2-3 contains no language relative to these items being part of the TSRs "as necessary." Thus, the proposed ISMP change is inconsistent with the SRD.

Office of Safety Regulation	Review Team Question or Comment Form
Date: 10/10/01	

Question/Comment No.: 01-ISMP-29

Cited Reference:

1. Contract No. DE-AC27-01RV14136, Section C, Standard 7, paragraph (e)(2)(iii)
2. RL/REG-97-13, *Office of Safety Regulation Position on Contractor-Initiated Changes to the Authorization Basis*

Cited Submittal Text:

Section 3.11, pg. 3-24

The following hierarchy of safety measures is incorporated into the RPP-WTP design.

1) Operational Preventive Measure (OPM) is a corrective action taken by an operator to terminate the development of a fault sequence. Examples include operator responses to system parameters, sampling and chemical analyses, control system indications or alarms, and procedural instructions. An OPM is considered the first line of protection against a hazard under normal facility operating conditions. Should the OPMs fail, protective systems and devices are designed to automatically operate.
2) Engineered Protection Systems operate automatically to prevent a hazard from occurring, and generally use hardwired trips, mechanical devices, or programmable electronic systems (such as programmable logic controllers) commensurate with the potential risk of the hazardous situation. If protective measures fail, a hazardous situation may occur, the consequences of which can be reduced by the action of mitigating systems.
3) Mitigating Systems attenuate the consequence of a hazardous situation once it has occurred. They include ventilation systems, radiological alarm systems, and evacuation systems.

Question/Comment: What is the technical justification for the deletion of this text from the ISMP? Where is the redundant information contained in the ISMP and why is the deleted information not pertinent to the subject of safety systems design? If the information is not discussed elsewhere in the ISMP, explain why this reduction in commitment is appropriate, or alternatively, why the ISMP is acceptable without this description.

Explanation/Discussion: The Attachment 2 justification is that this deletion removes redundant information unnecessary to the understanding of this section. This justification is inadequate.

Office of Safety Regulation	Review Team Question or Comment Form
Date: 10/10/01	
Question/Comment No.: 01-ISMP-30	
Cited Reference: 1. Contract No. DE-AC27-01RV14136, Section C, Standard 7, paragraph (e)(2)(iii) 2. RL/REG-97-13, *Office of Safety Regulation Position on Contractor-Initiated Changes to the Authorization Basis*	
Cited Submittal Text: Section 3.16.5, pg. 3-39, including the ten items (performance monitoring areas) listed Performance monitoring for radiological, nuclear, and process safety is conducted by RPP-WTP quality assurance, process safety, health physics, nuclear safety, and regulatory staff.	
Question/Comment: Why is the deletion of a "multidisciplinary team" including environmental protection and industrial safety not a reduction in commitment?	
Explanation/Discussion: The current ISMP states that "Performance monitoring is conducted by a RPP-WTP multidisciplinary team consisting of quality assurance, environmental protection, industrial safety, process safety, health physics, nuclear safety, and regulatory staff." The Attachment 2 justification for this change is that it clarifies the scope of these Performance Indicators and clarifies the list of examples. This goes beyond clarification. It is a reduction in commitment by removing the requirement for a multidisciplinary team that includes membership representing environmental protection and industrial safety.	

Office of Safety Regulation	Review Team Question or Comment Form
Date: 10/10/01	

Question/Comment No.: 01-ISMP-31

Cited Reference:

1. Contract No. DE-AC27-01RV14136, Section C, Standard 7, paragraph (e)(2)(iii)
2. RL/REG-97-13, *Office of Safety Regulation Position on Contractor-Initiated Changes to the Authorization Basis*

Cited Submittal Text:

Section 4.1.3, pg. 4-5

In addition, the consensus codes and standards in the SRD are used in the design of SSCs, as linked to SRD Safety Criteria. This link is implemented through Project documents like the Design Input Memorandum. These links are controlled to ensure that configuration management of the linkage to the SRD is maintained at all times.

Question/Comment: Why is the deletion of the text describing the additional project-specific guidance and specifications for topical areas and individual systems and areas of the facility provided via design guides not a reduction in commitment? What will replace the Design Guides from a configuration management and linkage to the SRD perspective?

Explanation/Discussion: The existing ISMP states "In addition, the consensus codes and standards used in the design of SSCs are linked to SRD Safety Criteria. This link is implemented through Project documents like the Design Input Memorandum. Design guides provide additional detailed project-specific guidance and specifications for topical areas (e.g., radiation protection, human factors, natural phenomena design) and individual systems and areas of the facility (e.g., process ventilation system, melter cell walls, process offgas). All of these links are controlled to ensure that configuration management of the linkage to the SRD is maintained at all times." The Attachment 2 justification for this proposed change is that the project is moving away from the use of Design Guides. This represents a reduction in commitment.

In typical nuclear industry practice, documents like "design guides" would form the basis for development of "System Descriptions" or "Design Basis Documents", which would be valuable controlled references for later use by system/design engineers when facility modifications and changes to the licensing bases of the facility are considered/implemented. The adequacy of using the Design Input Memorandum without the additional details provided in the design guides must be justified from a scope, control, and topical/system alignment perspective.

Office of Safety Regulation	Review Team Question or Comment Form
Date: 10/10/01	

Question/Comment No.: 01-ISMP-32

Cited Reference:

1. Contract No. DE-AC27-01RV14136, Section C, Standard 7, paragraph (e)(2)(iii)
2. RL/REG-97-13, *Office of Safety Regulation Position on Contractor-Initiated Changes to the Authorization Basis*

Cited Submittal Text:

Section 4.1.4, pg. 4-5

Safety Management Programs will be scrutinized and revised, as appropriate, as a part of the SRD revision process. This revision process incorporates updated hazards and design information as well as potential new regulatory requirements. These SRD revisions will ensure that the safety management programs are appropriately tailored to the hazards posed by the facility and comply with laws, regulations, and contractual commitments.

Question/Comment: Why is the deletion for biannual revision of the SRD from the above cited text not a reduction in commitment?

Explanation/Discussion: The existing ISMP includes the word "biannual" before "SRD" in the first sentence and again refers to a biannual review in the last sentence. The Attachment 2 justification for this proposed change is that it reflects the project practice of continual SRD maintenance, in compliance with DOE/RL-96-00006 and conformance with RL/REG-97-13 to provide continual maintenance of AB documents. This is an incorrect justification. The contractor is indeed bound by the continuous AB maintenance requirements as defined in DOE/RL-96-0006 and RL/REG-97-13 and implemented using the ABCN process. However, this ISMP requirement reflects the need for the contractor to review and "clean-up" the SRD on a biannual basis to pick up the small changes that did not trigger the DOE review and approval requirements from RL/REG-97-13. This is the normal AB document maintenance process; continuous changes as necessary, and periodic updates to pick up other required changes.

Office of Safety Regulation	Review Team Question or Comment Form
Date: 10/10/01	

Question/Comment No.: 01-ISMP-33

Cited Reference:

1. Contract No. DE-AC27-01RV14136, Section C, Standard 7, paragraph (e)(2)(iii)
2. RL/REG-97-13, *Office of Safety Regulation Position on Contractor-Initiated Changes to the Authorization Basis*

Cited Submittal Text:

Section 5.5, pg. 5-7

The PHA is performed in accordance with the requirements of Project procedures. This includes establishment of personnel training and qualification requirements, confirming that personnel met these requirements, application of management reviews, and documentation of results.

Question/Comment: How do Project procedures ensure adequate retention (i.e., for the life of the process) of process hazard analysis records, including updates, revalidations, and the documented resolution of any recommendations? Why is the proposed change not a reduction in commitment in that the current ISMP commits to performance of the PHA in accordance with the applicable project QA requirements?

Explanation/Discussion: SRD Safety Criterion 3.1-8 requires that employers shall retain process hazards analyses and updates or revalidations as well as the documented resolution of any recommendations for the life of the process. The existing ISMP (Section 5.5) states that the PHA is performed in accordance with the requirements of the Project QAP. The QAP (now the QAM) contains retention requirements for project records (in general, not specifically those associated with the PHA). The intent of the existing ISMP appears to have been to invoke the applicable QA requirements into the project PHA. The proposed change from the QAP (QAM) to undefined project procedures eliminated the ISMP commitment to perform the PHA in accordance with applicable project QA requirements. Based on the submittal, there is no way for OSR to confirm that the undefined project procedures are consistent with the requirements of SRD SC 3.1-8.

Office of Safety Regulation	Review Team Question or Comment Form
Date: 10/10/01	
Question/Comment No.: 01-ISMP-34	
Cited Reference: 1. Contract No. DE-AC27-01RV14136, Section C, Standard 7, paragraph (e)(2)(iii) 2. RL/REG-97-13, *Office of Safety Regulation Position on Contractor-Initiated Changes to the Authorization Basis*	
Cited Submittal Text: Table 8-1, pg. 8-3 Table 8-1 entry dealing with the subject of "Environmental Protection"	
Question/Comment: Since environmental protection can involve radiological, nuclear and/or process safety, why doesn't the deletion of "Environmental Protection" from the table of Safety Management Records (Table 8-1) represent a reduction in commitment?	
Explanation/Discussion: The Attachment 2 justification for this deletion is that this subject is outside the radiological, nuclear, and process safety scope of the ISMP. Given that environmental protection can involve radiological, nuclear and/or process safety considerations, this is not an acceptable justification for this proposed change.	

Office of Safety Regulation	Review Team Question or Comment Form
Date: 9/27/01	
Question/Comment No.: 01-ISMP-035	
Cited Reference: 1. Contract No. DE-AC27-01RV14136, Section C, Standard 7, paragraph (e)(2)(iii). 2. RL/REG-97-13, Office of Safety Regulation Position on Contractor-Initiated Changes to the Authorization Basis	
Cited Submittal Text: ISMP section 3.16.5, "Performance Monitoring:" Performance monitoring is conducted to ensure high standards of performance in the following areas: 1) Conduct of operations and maintenance <u>(during operations)</u>	
Question/Comment: The change inserted the underlined, parenthetical phrase to clarify the applicability of "conduct of operations and maintenance" performance monitoring to the "operations phase" of the project. This clarification now excludes performance monitoring from the "commissioning phase," which will be the first time that the conduct of operations and maintenance processes/procedures are implemented during pre-operational testing. What is the basis for performance monitoring not being applied to conduct of operations and conduct of maintenance during the commissioning testing of the construction phase of the project to ensure high standards of performance in these areas during pre-operational testing? What is the safety evaluation of this change?	
Explanation/Discussion:	

Office of Safety Regulation	Review Team Question or Comment Form
Date: 9/27/01	

Question/Comment No.: 01-ISMP-036

Cited Reference:

1. Contract No. DE-AC27-01RV14136, Section C, Standard 7, paragraph (e)(2)(iii).
2. RL/REG-97-13, *Office of Safety Regulation Position on Contractor-Initiated Changes to the Authorization Basis*

Cited Submittal Text:

ISMP section 4.2.3.4, "Technical Safety Requirements" (focus of question), ISMP section 3.14, "Commissioning and Operations" (secondary reference).

ISMP section 3.14, "Commissioning and Operation," states in part that, "When systems have sufficiently demonstrated their ability to function, process operation may begin. A series of system performance demonstrations (SPD's) are typically performed to commission new facilities, and the number of SPD's depends on the function of the facility and materials handled. For the RPP-WTP, the following four levels of SPD are demonstrated:

1) Process systems using water (cold test)
2) Mechanical handling systems (cold test)
3) Facility operation using simulants (cold test)
4) Facility operation using active materials (hot test)

ISMP section 4.2.3.4, "Technical Safety Requirements," states in part that, "The TSR's, effective during operations and deactivation, will be based on the FSAR, accident analysis assumptions, and any facility-specific commitments made."

Question/Comment:

The change to section 4.2.3.4 that makes TSR's effective during operations and deactivation excludes the commissioning phase from TSR implementation. Because the latter part of the commissioning phase includes "hot testing," the TSR's must be implemented and complied with during such testing.

a) Provide the basis for not developing and implementing TSR's the commissioning testing of the project to ensure that "hot testing" is performed pursuant to the conditions, safe boundaries, and management or administrative controls necessary to ensure the safe operation of the facility?
b) If TSR's are not going to be utilized for the commissioning of the facility, explain the controls that will be used during this testing which are equivalent to the development and implementation of TSR's.
c) What is the safety evaluation of this change?

Explanation/Discussion:

Office of Safety Regulation	Review Team Question or Comment Form
Date: 9/27/01	

Question/Comment No.: 01-ISMP-037

Cited Reference:

1) Contract No. DE-AC27-01RV14136, Section C, Standard 7, paragraph (e)(2)(iii).
2) RL/REG-97-13, *Office of Safety Regulation Position on Contractor-Initiated Changes to the Authorization Basis*
3) SRD Appendix B Sections 4.3-6, 4.3-7
4) DOE/RL-96-0006 Sections 4.2.6.1 to 4.2.6.3

Cited Submittal Text:

ISMP section 3.21.3, "Strategy for the reduction of human error"

The operations addressed include all those that are directly associated with the control and monitoring of the facilities. The types of operations human factors encompasses includes normal operations, maintenance (breakdown and planned), start-up operations and shutdown operations (both 'controlled' and emergency).

Question/Comment:

The above text was newly added to the referenced section of the ISMP and excludes application of human factors (HF) to "anticipated occurrences" and "accident conditions." Appendix B of the SRD states that HF engineering (HFE) shall be conducted in accordance with IEEE Std 1023-1988 as tailored to the work and hazards of the RPP-WTP. Appendix B also mandates formal consideration of HFE techniques and methodologies recommended in the subordinate standard to hazards of severity levels SL-1 and –2. The newly added text appears to be a reduction in commitment.

(a) Provide the basis for the exclusion of "anticipated occurrences" and "accident conditions" from operations.

(b) What is the safety evaluation for this change?

Explanation/Discussion: